

Eligible Training Provider All Student Data Collection

Workforce Innovation and Opportunity Act Waiver Request Template

Under the Secretary of Labor's waiver authority outlined in Section 189(i)(3)(A) of the Workforce Innovation and Opportunity Act (WIOA) and 20 CFR and 679.600, the Secretary may waive certain provisions of WIOA Title I Subtitle A, B, and E and provisions found in Sections 8-10 of the Wagner-Peyser Act. WIOA Section 189(i)(3)(B) and 20 CFR 679.620 identify elements that must be included in a waiver request. A State may request a waiver in its overall Unified or Combined State Plan submission or modification. Or, if submitting separate from the State Plan submission, States may use this template to request a waiver. States may also request a waiver using their own format or form, as long as elements required by WIOA are addressed in the request. After reviewing a state's initial request, the Employment and Training Administration (ETA) may request additional information if necessary to complete its review.

To submit a waiver request, e-mail this completed form (or state-developed form) along with a cover letter to WIOA.Plan@dol.gov and the appropriate ETA regional office. ETA will also accept hard copy submissions.

Date: March 15, 2018

State: Illinois

Agency: Illinois Department of Commerce and Economic Opportunity

Provide narrative for the following elements:

Statutory and/or regulatory requirements to be waived

Indicate which part of the WIOA or the regulations the state would like to waive.

The State of Illinois is seeking a waiver from the following Section(s):

1. Sections 116 and 122 of WIOA, and at 20 CFR 677.230 and 20 CFR 680.400 thru 680.530.

Specifically, Illinois is requesting to waive the requirements which require the collection and reporting of performance related data on all students participating in training programs listed on the state's ETPL.

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Background

Illinois' education and workforce agencies established a unified ILDS inter-agency data sharing agreement and created the Common Demographic Database Administrator (CDDA) as part of the Illinois Longitudinal Data System (ILDS) and the Workforce Data Quality Initiative (WDQI). Because of the ILDS efforts, Illinois can utilize the ILDS Master Client Index (MCI) unique identifier to leverage existing data systems and data sources to assist it with meeting the WIOA ETP performance reporting requirements. The Illinois Board of Higher Education, a member of the ILDS, is also the oversight body for private business vocational schools.

While Illinois released policy guidelines for the ETPL certification and works diligently to address streamlining reporting, the state continues to face challenges that are impeding full implementation of the ETPL requirement:

- Ensuring fairness in the process of determining training provider eligibility.
- Reducing the burden on training providers to submit performance information to the state which may not be readily accessible.
- Much of the performance information is self-reported through surveys, etc., which makes it difficult to get accurate performance data since students may not respond to surveys and, as a result, schools may just provide performance information they previously collected without resurveying students.
- Proprietary schools do not currently have a statewide system to report student data, and as such, there is no way to automatically match students with other data sources to calculate outcomes. This results in a large reporting burden on these types of training providers.
- Providing Information on eligible training programs to WIOA participants in a way that helps them make good decisions about how to use their ITAs.

Actions undertaken to remove state or local barriers

Describe the actions undertaken to remove state or local barriers.

There are currently no state or local statutory or regulatory barriers to implementing the requested waiver. State of Illinois regulations and policy align with current federal law.

Goals and expected programmatic outcomes of waiver

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Describe and specify how the waiver will help the state achieve an identified strategic goal or set of goals that it has outlined in its State Plan. If possible and appropriate the type of waiver requested, provide quantifiable projections for programmatic outcomes that will result from the waiver.

While the IWIB Evaluation and Accountability Committee may add others, at a minimum the goals and outcomes related to this waiver request include:

- Providing additional training options to enhance consumer choice and targeting training program that are in-demand
- Increasing the number of training providers to enhance competition and create economies of scale.
- Better overall performance outcomes for individuals pursuing training via ITAs.
- Stronger partnerships and relationships between training providers and the public workforce system.

Individuals impacted by the waiver

Describe which populations the waiver will benefit, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment.

Individuals who access training services or provide training services in Illinois will benefit from this waiver.

Process for monitoring progress in implementation

Describes the processes used to monitor the progress in implementing the waiver.

Annual WIOA on-site programmatic reviews will include an evaluation of the impact the waivers have on programmatic goals and outcomes.

Additionally, the IWIB Evaluation and Accountability Committee will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices.

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State staff involved with the administration of the ETPL and performance reporting will periodically examine the appropriateness and the effectiveness of this waiver. This strategy ensures that the goals described above, as well as those outlined in the State's Unified Plan, are consistent with established objectives of the WIOA and federal and state regulations.

Notice to affected local boards

Address how local boards affected by the waiver were notified of the request.

Local Boards via Board members and/or Board staff as well as WIOA partners and other interested stakeholders participate in policy development. Additionally, LWIBs receive the opportunity to participate in public comment period that includes webinars.

Public Comment

Provide a description of the proactive solicitation of public comments. At a minimum, post the proposed waiver request to the state's official website for comment. Ideally, develop a targeted outreach strategy to collect input and comment from all affected stakeholders. Submit any comments or concerns collected in this manner and the outcome of the state's review of the public comments received.

In accordance with the WIOA Regulations at 20 CFR 676.135, Illinois is submitting a modification to its Unified State Plan, which is subject to the requirements outlined in the WIOA Regulations at 20 CFR 676.130(d) for public review and comment. As such, Illinois's waiver request posted on our website for comment and review by required parties and the public.

Waiver Impact

Collect and report information about waiver outcomes in the State's WIOA Annual Report. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

The IWIB Evaluation and Accountability Committee will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices. Outcomes of the waiver will be reported in the WIOA Annual Report.